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**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

United States of America,

Plaintiff,

vs.

Yousef Mohammad Ramadan,

Defendant.

FILED
CLERK'S OFFICE

NOV 13 2018

U.S. DISTRICT COURT
EASTERN MICHIGAN

Criminal No. 17-20595

Hon. Marianne O. Battani

VIOLATIONS:

18 U.S.C. § 922(k)

18 U.S.C. § 922(j)

26 U.S.C. § 5861(d)

SUPERSEDING INDICTMENT

The Grand Jury charges that:

COUNT ONE

18 U.S.C. § 922(k) – *Possession of a Firearm
with an Obliterated Serial Number*

On or about August 23, 2017, in the Eastern District of Michigan,
the defendant, Yousef Mohammad Ramadan, knowingly possessed
firearms, that is:

1. A Jennings J-22 .22 caliber semi-automatic handgun; and
 2. A Ruger MK II .22 caliber semi-automatic handgun,
- which had been shipped and transported in interstate and foreign
commerce, from which the manufacturer's serial number had been

removed, altered, and obliterated, in violation of Title 18, United States Code, Sections 922(k) and 924(a)(1)(B).

COUNT TWO

18 U.S.C. § 922(j) – *Possession of Stolen Firearm*

On or about August 23, 2017, in the Eastern District of Michigan, the defendant, Yousef Mohammad Ramadan, knowingly possessed a stolen firearm, that is, a Jennings J-22 .22 caliber semi-automatic handgun, which had been shipped and transported in interstate and foreign commerce, knowing and having reasonable cause to believe the firearm was stolen, in violation of Title 18, United States Code, Sections 922(j) and 924(a)(2).

COUNT THREE

26 U.S.C. § 5861(d) – *Possession of Unregistered Silencer*

On or about August 23, 2017, in the Eastern District of Michigan, the defendant, Yousef Mohammad Ramadan, knowingly possessed a firearm, that is, a silencer, not registered to him in the National Firearms Registration and Transfer Record, in violation of Title 26, United States Code, Sections 5841, 5861(d), and 5871.

FORFEITURE ALLEGATION

The allegations of Counts One, Two, and Three of this Indictment are re-alleged and by this reference fully incorporated herein for the purpose of alleging forfeitures to the United States of America of certain property in which the defendant has an interest, pursuant to the provisions of Title 18, United States Code, Section 924(d)(1), Title 26, United States Code, Section 5872, and Title 28, United States Code, Section 2461(c).

Upon conviction of any offense alleged in Count One and Two, the defendant shall forfeit to the United States, pursuant to 18 U.S.C. § 924(d), and 28 U.S.C. § 2461(c), any firearm and ammunition involved or used in the knowing commission of the offense.

Upon conviction of the offense alleged in Count Three, the defendant shall forfeit to the United States, pursuant to 26 U.S.C. § 5872 and 28 U.S.C. § 2461(c), any firearm involved in the knowing commission of the offense.

The property that is subject to forfeiture includes, but is not limited to, the following:

1. Jennings J-22 .22 caliber semi-automatic handgun;

2. Ruger MK II .22 caliber semi-automatic handgun; and

3. The silencer seized on or about August 23, 2017, in the search of the storage unit the defendant used at Devon Self Storage, 4750 South State Road, Ann Arbor, Michigan.

All pursuant to Title 18, United States Code, Section 924(d)(1), and Title 26, United States Code, Section 5872, as made applicable by Title 28, United States Code, Section 2461(c).

THIS IS A TRUE BILL.

s/Grand Jury Foreperson
Grand Jury Foreperson

Matthew Schneider
United States Attorney

s/Cathleen M. Corken
Cathleen M. Corken
Chief, National Security Unit

s/Benjamin C. Coats
Benjamin C. Coats
Assistant United States Attorney

s/Hank Moon
Hank Moon
Assistant United States Attorney

Date: November 13, 2018

United States District Court Eastern District of Michigan	Criminal Case Cover Sheet	Case Number 17-20595
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NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

Companion Case Information	Companion Case Number:
This may be a companion case based upon LCrR 57.10 (b)(4) ¹ :	Judge Assigned:
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	AUSA's Initials: <u>BCC</u>

FILED
CLERK'S OFFICE
NOV 13 2018
U.S. DISTRICT COURT
EASTERN MICHIGAN

Case Title: USA v. D-1 Yousef Mohammad Ramadan

County where offense occurred : Washtenaw County, MI

Check One: ☒ Felony ☐ Misdemeanor ☐ Petty

☐ Indictment/ ☐ Information --- no prior complaint.

☐ Indictment/ ☐ Information --- based upon prior complaint [Case number:]

☒ Indictment/ ☐ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

Superseding Case Information

Superseding to Case No: 17-20595

Judge: Marianne O. Battani

- ☐ Corrects errors; no additional charges or defendants.
☐ Involves, for plea purposes, different charges or adds counts.
☒ Embraces same subject matter but adds the additional defendants or charges below:

Defendant name	Charges	Prior Complaint (if applicable)
Yousef Mohammed Ramadan	26 U.S.C. § 5861 (d) 18 U.S.C. § 922 (j)	

Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

11/13/2018

Date

B. C. Coats

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¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.